

JILL P. TELFER (State Bar No. 145450)
LAW OFFICES OF JILL P. TELFER
A Professional Corporation
331 J Street, Suite 200
Sacramento, California 95814
Telephone: (916) 446-1916
Facsimile: (916) 446-1726
email: jilltelfer@yahoo.com

Attorney for Plaintiff
BRIAN SETENCICH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRIAN SETENCICH

Plaintiff,

vs.

THE AMERICAN RED CROSS, a non-profit
corporation; STEVE BROWN; ROBERT
BROWNING; and DOES 1 through 30, inclusive,

Defendants.

Case No. C 07-03688 SBA

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO COMPEL DEFENDANT
AMERICAN RED CROSS' FURTHER
RESPONSES TO PLAINTIFF'S DEMAND
FOR PRODUCTION OF DOCUMENTS
AND DOCUMENT PRODUCTION
[PROPOSED] ORDER]**

Date: June 3, 2008

Time: 1:00 p.m.

Ctrm: 3

Judge: Hon. Sandra Brown Armstrong

TO DEFENDANTS AND THEIR ATTORNEY OF RECORD

PLEASE TAKE NOTICE that on June 3, 2008, at 1:00 p.m. or as soon thereafter as the matter may be heard in the in the above-entitled Court located at 1301 Clay Street, Oakland, California, 94612, in Courtroom 3. Plaintiff Brian Setencich will and hereby does move this Court under Federal Rule of Civil Procedure 37 to compel Defendant American Red Cross ("ARC") to further respond and produce documents responsive to Plaintiff's Request for Production of Documents, Set One.

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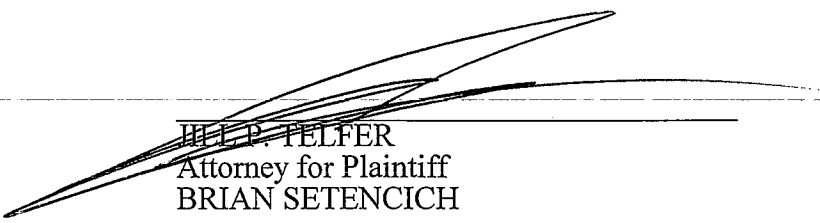
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1 This motion will be based on this Notice of Motion and Motion, the attached Memorandum of
2 Points and Authorities, all documents on file with this court, and the arguments presented at the hearing.
3 This motion is made pursuant to the United States District Court, Northern District of California, Local
4 Rule 37.2.

5 Date: April 28, 2008

LAW OFFICES OF JILL P. TELFER
A Professional Corporation

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8  JILL P. TELFER
9 Attorney for Plaintiff
BRIAN SETENCICH
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1 **PROOF OF SERVICE**

2 CASE: *Brian Setencich v. The American Red Cross, et al.*; United States District Court of
3 California, Northern District

4 CASE NO: **C 07-03688 SBA**

5 I, the undersigned, declare I am a citizen of the United States and am employed in the County
6 of Sacramento, State of California. I am over the age of eighteen years and not a party to the within-
entitled action. My business address is 331 J Street, Suite 200, Sacramento, CA 95814.

7 I am readily familiar with this firm's practice for collection and processing of correspondence
for mailing with the United States Postal Service. On the date indicated below, I served the
following documents by:

8 to be served on the party(ies) or their (its) attorney(s) of record in this action:

9 ☐ Via Mail: I caused each envelope (with postage affixed thereto) to be placed in the U.S. mail
10 at Sacramento, California.

11 ☐ Via **CERTIFIED** Mail: I caused each envelope (with postage affixed thereto) to be placed
12 in the U.S. mail at Sacramento, California.

13 ☒ Via Personal Service: I instructed each document to be hand-delivered via **HAND**
DELIVERY via **ATTORNEY'S DIVERSIFIED SERVICES** to the address listed below.

14 ☐ Via Overnight Courier: I caused each envelope to be delivered via overnight mail by
15 **FEDERAL EXPRESS**.


16 ☐ Via **FACSIMILE**: I instructed such to be transmitted via facsimile to the office(s) list below.

17 **DOCUMENTS SERVED: MEMORANDUM OF POINTS AND AUTHORITIES IN**
18 **SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO REQUEST FOR**
PRODUCTION, SET ONE

19 ADDRESSED TO :

20 Ronald J. Klepetar, Esq.
21 Sabrina L. Shadi, Esq.
22 **BAKER & HOSTETLER**
12100 Wilshire Blvd., 15th Floor
Los Angeles, CA 90025-7120

23
24 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 29,
25 2008, at Sacramento, California.

26 
27 Camille Rasmussen
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